

DEPOSITION of JEFFREY ALBERTI Taken 12/05/2005 (GREENBERG versus FALMOUTH)

SHEET 1 PAGE 1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION\*\*\*\*\*  
NOAH GREENBERG

-VS-

TOWN OF FALMOUTH and  
GANNETT FLEMING, INC.  
\*\*\*\*\*

\* Civil Action

\* No. 04-11934-GAO

APPEARANCES: Richard M. Russell, Esquire  
205 Worcester Court Unit B-2  
Falmouth, Massachusetts 02540;  
Representing the Plaintiff.Daniel G. Skrip, Esquire  
OFFICES PIERCE, DAVIS & PERRITANO, LLP  
Ten Winthrop Square  
Boston, Massachusetts 02110;  
Representing the Town of Falmouth.John C. Barker, Esquire  
LAW OFFICES OF MICHIEZIE & SAWIN, LLC  
745 Boylston Street - 5th Floor  
Boston, Massachusetts 02116;  
Representing Gannett Fleming, Inc.DEPOSITION of JEFFREY ALBERTI, a witness  
of lawful age, taken on behalf of the Plaintiff in\*\*\*\*\*  
Parisi Court Reporting  
270 Hixville Road  
North Dartmouth, Massachusetts 02747  
(508) 984-5502

Barbara St. Jean, RPR, CSR No. 127693

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1 the above-entitled cause wherein Noah Greenberg is the  
2 Plaintiff and Town of Falmouth et al are the Defendants,  
3 pending before the United States District Court for  
4 the District of Massachusetts, Eastern Division,  
5 pursuant to Notice and agreement of parties before  
6 Barbara St. Jean, CSR, RPR, a Notary Public in and for  
7 the Commonwealth of Massachusetts, at the offices of  
8 Richard M. Russell, P.C., 205 Worcester Court,  
9 Falmouth, Massachusetts, on Monday, the 5th day of  
10 December, 2005, at 10:00 o'clock a.m.

\*\*\*\*\*

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1 A I'm responsible for overseeing projects from  
 2 conceptual design through construction phase  
 3 services.  
 4 Q And did you ever have a post-graduate degree, one or  
 5 or more postgraduate degrees that you've obtained?  
 6 A I have a Bachelor of Civil Engineering from  
 7 Villanova University; and that's it.  
 8 Q And when did you obtain that degree?  
 9 A Nineteen ninety-two.  
 10 Q How long have you been employed at Gannett Fleming?  
 11 A Since 1992; so going on 13 years or 14 years.  
 12 Q And is that the same year you obtained the degree?  
 13 Is that what you said?  
 14 A That's correct.  
 15 Q Okay. Are you familiar with a project in Falmouth  
 16 with respect to the Town of Falmouth Department of  
 17 Public Works maintenance facility?  
 18 A Yes, I am.  
 19 Q Okay. How long have you been familiar with that?  
 20 A I was -- I am the Project Manager for the project.  
 21 Q And how would you describe the project?  
 22 A It's a renovation and expansion of the existing  
 23 Public Works facility.  
 24 MR. RUSSELL: Okay. Would you mark  
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1 MR. BARKER: Will we be getting  
 2 copies of these exhibits?  
 3 MR. RUSSELL: Sure.  
 4 Just for the record, Exhibit 1 is  
 5 entitled Notice of Deposition of Gannett Fleming,  
 6 Inc.  
 7 Q And, Mr. Alberti, are you aware that you're here  
 8 today to give information known to Gannett Fleming  
 9 regarding the Falmouth Department of Public Works  
 10 maintenance facility project?  
 11 A Yes, I am.  
 12 Q And when I say Falmouth Department of Public Works  
 13 maintenance facility project, you understand that to  
 14 be the addition and renovation project that you  
 15 described earlier?  
 16 A Yes.  
 17 Q Mr. Alberti, I'm gonna show to you what's been  
 18 marked as Exhibit Number 2. And the title of that  
 19 document is Defendant Gannett Fleming's Responses to  
 20 Plaintiff's First Set of Interrogatories. I ask you  
 21 to peruse that; and let me know if you're familiar  
 22 with that. And in particular, if you could look to  
 23 the second to the last page and let me know if  
 24 that's your signature that appears on that document.  
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1 that, please.  
 2 (Whereupon the above-described  
 3 document was then marked as  
 4 Plaintiff's Exhibit No. 1)  
 5 Q Mr. Alberti, I'm going to show you a document that  
 6 the Court Reporter has marked as Exhibit 1 and ask  
 7 you if you are familiar with that document.  
 8 A Yes, I am.  
 9 Q And how are you familiar with that?  
 10 A I have reviewed it. I have a copy; and I've  
 11 reviewed it.  
 12 Q Okay. You indicated that you're familiar with an  
 13 addition and renovation project at the Falmouth  
 14 Department of Public Works maintenance facility. Do  
 15 you have a particular role in that project?  
 16 A Yes. I'm currently the Project Manager for the  
 17 project.  
 18 Q And Gannett Fleming has a role in that project?  
 19 A Yes. We do.  
 20 Q And what would Gannett Fleming's role be?  
 21 A We are the designers of the project.  
 22 MR. RUSSELL: Would you mark that,  
 23 please.  
 24 (Whereupon the above-described  
 document was then marked as  
 Plaintiff's Exhibit No. 2)  
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1 Actually, it would it be the last  
 2 page. I'm sorry.  
 3 A Yes. That is my signature.  
 4 Q And did you review that document before you put your  
 5 signature to it?  
 6 A Yes, I did.  
 7 Q And what was the purpose of your review of that  
 8 document?  
 9 A To confirm the information in the document.  
 10 Q And did you in fact confirm the information in the  
 11 document?  
 12 A Yes, I did.  
 13 Q You confirmed that it was accurate?  
 14 A Yes, I did.  
 15 Q Can you tell me how Gannett Fleming first became  
 16 aware of the Falmouth D.P.W. project?  
 17 A There was a Notice published in the Central Register  
 18 back in 2001, I believe.  
 19 Q And what is the Central Register?  
 20 A Is it a Massachusetts publication that lists  
 21 projects that are available for engineering and  
 22 architectural firms to bid on. I'd like to rephrase  
 23 that; not to bid on, but actually submit proposals  
 24 for.  
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- 1 referring to back in June of 2001?
- 2 A At the time of this statement, it was a general
- 3 statement to knock down walls. The Town -- as far
- 4 as I recall, the Town didn't identify what walls
- 5 would be knocked down.
- 6 Q Did they comment any further than that?
- 7 A Not that I recall at this time.
- 8 Q About two-thirds of the way down, there's a note,
- 9 "Would like to use upstairs space in admin gable for
- 10 future use." Do you see that?
- 11 A Yes. I do.
- 12 Q What do you recall about using an upstairs space
- 13 that was discussed at this meeting?
- 14 A My understanding was the Town wanted to build a
- 15 second floor to their addition in the administration
- 16 area.
- 17 Q That would be the office space area, administration
- 18 area. Is that correct?
- 19 A That is correct.
- 20 Q And did they make any reference to the existing
- 21 plans when they made that comment?
- 22 A Not that I recall.
- 23 Q Other than what's reflected in your notes, do you
- 24 recall that they made any comments about the
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- 1 A Yes. I have.
- 2 Q Earlier, you said that at some point at the
- 3 beginning of this D.P.W. project, you were given a
- 4 copy of a Request for Qualifications. Do you recall
- 5 that testimony?
- 6 A Yes, I do.
- 7 Q Would this be the document that you were referring
- 8 to then?
- 9 A Yes. It is.
- 10 Q There's a very faint part here on the left-hand side
- 11 of the first page. Do you have any idea what that
- 12 says?
- 13 A I'm unable to make that out.
- 14 Q Do you recognize the handwriting at all?
- 15 A Yes. It appears to be my handwriting.
- 16 Q Can you make out any of the words?
- 17 A Yeah. I see the words "Sandy, Town, to, and Dot.
- 18 Q Is Sandy -- does Sandy mean something to you?
- 19 A Does not.
- 20 Q Really?
- 21 A No.
- 22 Q It doesn't mean anything to you?
- 23 MR. BARKER: Objection.
- 24 Q Do you think it's a person? Or is it a description
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- 1 existing plans?
- 2 A Not that I recall.
- 3 MR. RUSSELL: Would you mark that,
- 4 please.
- 5 (Whereupon the above-described
- 6 document was then marked as
- 7 Plaintiff's Exhibit No. 4)
- 8 MR. RUSSELL: Mr. Alberti, the Court
- 9 Reporter has marked as Exhibit 4 a six-page
- 10 document, and the first page of which reads
- 11 Department of Public Works, William B. Owen,
- 12 Director. The Town of Falmouth Department of Public
- 13 Works Request for Qualifications architectural
- 14 design services.
- 15 Q And I would ask you if you've seen that document
- 16 before.
- 17 A Yes. I have.
- 18 Q There's a note at the top of it, CC, colon, J.J.A.
- 19 Does that have some meaning to you?
- 20 A Yes. That is my initials indicating that the
- 21 document was provided to me.
- 22 Q Do you know who made that note?
- 23 A I do not.
- 24 Q And have you prior to today had an occasion to study
- this document?
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- 1 of the characteristics of, you know, the soil
- 2 conditions?
- 3 A I believe it is a person.
- 4 Q Under that, does it say near? Here? Town? Near
- 5 Town? Or can you not make it out?
- 6 A Oh, actually, to the Town, it appears to state
- 7 near.
- 8 Q Near Town. So does it help you at all
- 9 understand what that might have said?
- 10 A No. It does not.
- 11 Q Is there an original of this document that would be
- 12 most legible?
- 13 A Yes. There is.
- 14 Q There any reason why it's so faint?
- 15 A I recall reviewing it. And it was written in
- 16 green. And green doesn't copy as well.
- 17 Q Okay.
- 18 A Green pencil, that is.
- 19 Q Over the second, third, and fourth pages, there are
- 20 some notes that are made on this document. Do you
- 21 see those?
- 22 A Yes. I do.
- 23 Q Can you -- well, strike that. Do you have an
- 24 understanding of whose notes those are?
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- 1 A Those appear to be my notes.  
 2 Q And do you know when you would have made those  
 3 notes?  
 4 A I would have made those notes when I received the  
 5 Request for Qualifications and reviewed it.  
 6 Q What was the purpose of the notes?  
 7 MR. BARKER: Just in general? Or  
 8 any specific one?  
 9 MR. RUSSELL: Just in general.  
 10 Q Do you have some purpose behind making the notes?  
 11 A My understanding is that these are items that are  
 12 important to address in the proposal.  
 13 Q Did your participation in the June 5th meeting  
 14 prompt any of these notes?  
 15 A I don't recall.  
 16 Q Do you know how soon after the June 5th, 2001,  
 17 meeting you would have received this document?  
 18 A According to the date stamp, June 11th, 2001,  
 19 received at Gannett Fleming. I don't recall exactly  
 20 when I received it once it was logged in.  
 21 Q The first page of this document that you were just  
 22 referring to on the bottom, it says Central Register  
 23 5/30/01 and 6/6/01. Do you see that?  
 24 A Yes, I do.

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- 1 A Yes, I do.  
 2 Q And under the preliminary plans for this project  
 3 were prepared in 1994 and may be used as a guide of  
 4 the Department's intent. These plans are attached  
 5 hereto as Exhibit -- excuse me -- Appendix A.  
 6 Do you see that?  
 7 A Yes, I do.  
 8 Q Do you recall that there were plans attached to this  
 9 document?  
 10 A Yes, I do.  
 11 Q And do you remember how many pages the plans  
 12 consisted of?  
 13 A I believe there were three plans.  
 14 Q Three pages of plans?  
 15 A Yes. I believe there were three 11-by-17 plans  
 16 attached.  
 17 Q Does Gannett Fleming have a record of what was  
 18 received, what plans were -- excuse me. Strike  
 19 that.  
 20 Does Gannett Fleming have a record of  
 21 what was attached to this document?  
 22 A Yes. We do. In fact, if I can add to my earlier  
 23 answer, I believe there were four 11-by-17 plans.  
 24 And we do have a copy.

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- 1 Q Does that have any meaning to you?  
 2 A No. It does not.  
 3 Q Would you suspect that this is the language of the  
 4 advertisement that appeared in the Central Register  
 5 that you discussed earlier?  
 6 A The entire R.F.Q.? When you refer to the language,  
 7 you're referring to the entire R.F.Q.?   
 8 Q No. The language in the Central Register. You  
 9 mentioned there was an advertisement in the  
 10 Central Register.  
 11 A Correct.  
 12 Q And my question was this first page, does this  
 13 appear to be what would have been advertised in the  
 14 Central Register?  
 15 A I don't recall. I'd have to review the  
 16 Central Register again.  
 17 Q Does Gannett Fleming keep a record of that?  
 18 A We do have a record of it, yes.  
 19 Q Is there any particular reason for keeping a record  
 20 of it?  
 21 A No particular reason.  
 22 Q On the third page of that document, it has a number  
 23 GF 00260. There's a heading Scope of Services. And  
 24 there are five items identified. Do you see that?

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- 1 Q Do you recall whether any of those plans were in  
 2 color?  
 3 A Yes.  
 4 Q How many of them were in color?  
 5 A One.  
 6 Q And can you characterize that one plan that was in  
 7 color and distinguish it from the others? Are you  
 8 able to do that?  
 9 A The plan would be described as a building elevation  
 10 plan.  
 11 Q After that paragraph I just read from, there's  
 12 another paragraph. And then following that, I'd  
 13 like to read the next two sentences.  
 14 "The designer shall review the  
 15 facility needs program previously completed and  
 16 obtain a working knowledge of the Department's  
 17 needs. The designer shall review the design with  
 18 the building user for compatibility with the final  
 19 determined needs." Do you see that?  
 20 A Yes. I do.  
 21 Q Do you have an understanding of what the language  
 22 facility's needs program refers to?  
 23 A My understanding is how much square footage would  
 24 be required.

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1 removing columns --  
 2 A Yes.  
 3 Q -- from vehicle storage.  
 4 A Yes.  
 5 Q That's why I said briefly; because it was very  
 6 brief. Is there a typical construction material for  
 7 a garage structure of that nature, I'll say?  
 8 A There is not. It all depends on the client.  
 9 Q You said that you've made a more careful study of  
 10 the plans that were attached as Appendix A to the  
 11 Town's Request for Qualifications. You recall  
 12 mentioning that?  
 13 MR. BARKER: Objection.  
 14 Recently?  
 15 MR. RUSSELL: Yes.  
 16 MR. BARKER: Eventually?  
 17 I see. Gotcha.  
 18 A Yes. Recently to prepare for this, yes.  
 19 Q Okay. Are you -- were you able to identify any of  
 20 the construction materials for the garage structure  
 21 as part of that review?  
 22 A I don't recall seeing any construction materials at  
 23 this time.  
 24 (Whereupon a document  
 was then marked as  
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1 interviews conducted as part of this project?  
 2 A We had a meeting with the Town, which may or may not  
 3 be considered an interview. It depends on what the  
 4 format of the interview is.  
 5 Q That's fair enough. What was the date of that  
 6 meeting?  
 7 A Our initial meeting was on January 28th, I believe,  
 8 of 2002.  
 9 Q What do you recall about that meeting?  
 10 A We met with the Town to discuss the scope of the  
 11 project.  
 12 Q When you say the Town, who did you meet with in  
 13 particular?  
 14 A Mr. Owen.  
 15 Q Was anybody else at this meeting representing the  
 16 Town?  
 17 A Not from the Town.  
 18 Q Who represented Gannett Fleming at the meeting?  
 19 A Myself and Michael Haire.  
 20 Q What is Michael Haire's role?  
 21 A With the project or in -- at Gannett Fleming?  
 22 Q At Gannett Fleming.  
 23 A He's a Vice-President.  
 24 Q Did he have any involvement in this D.P.W. project?  
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1 Plaintiff's Exhibit No. 6)  
 2 Q The Court Reporter has marked as Exhibit 6 a  
 3 document -- a one-page document. It appears to be a  
 4 Gannett Fleming note. Is that what you refer to  
 5 that heading as a note?  
 6 A It's a Gannett Fleming note. It's a -- it's a note  
 7 pad.  
 8 Q A note pad?  
 9 A It's a note pad with Gannett Fleming letterhead on  
 10 it.  
 11 Q Thank you. And I would ask you if you're familiar  
 12 with that document.  
 13 A Yes. I am.  
 14 Q And how are you familiar with it?  
 15 A I wrote this document.  
 16 Q The first paragraph mentions something about  
 17 conducting an interview. Do you see that --  
 18 A Yes, I do.  
 19 Q -- at the very end? What do you understand that to  
 20 mean?  
 21 A I would understand that to mean the Town sometimes  
 22 conducts interviews of the firms prior to selecting  
 23 them.  
 24 Q To your knowledge, was there any interview or  
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1 A Yes. Michael played a limited role as a principal  
 2 for the project.  
 3 Q You say at this meeting, you discussed the scope of  
 4 the project.  
 5 A That's correct.  
 6 Q What do you recall about discussing the scope of the  
 7 project?  
 8 A Off the top of my head, I don't recall the  
 9 specifics. There were general conversations about  
 10 what the project was to include, what the Town was  
 11 interested in, the schedule. We also discussed the  
 12 preliminary plans at that time. We indicated that  
 13 we did not want to use them because we had problems  
 14 with them. And the Town agreed that we did not need  
 15 to use them at that meeting. And that's just a  
 16 portion of what I recall from the meeting. I think  
 17 there was more discussed in addition to that.  
 18 Q More regarding the scope of the project? Or more  
 19 regarding agenda items that you haven't mentioned?  
 20 A I don't have the meeting memorized; so I -- I can't  
 21 just speak from my -- I'd have to go through my  
 22 notes to review what was discussed.  
 23 Q Did you ask in any way the delay between May and  
 24 June when this project was advertised in the  
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- 1 A My understanding, that's referring to the document  
2 that's titled Request for Qualifications prepared by  
3 the Town of Falmouth and issued to all designers,  
4 potential designers.  
5 Q That's the document that's already been marked as an  
6 exhibit. Is that correct?  
7 A That's correct.  
8 Q After referencing the Request for Proposals, it  
9 mentions the pre-proposal briefing. Do you see  
10 that?  
11 A Yes. I do.  
12 Q Can you tell me what that refers to?  
13 A That refers to the June 5th, 2001, meeting at the  
14 site.  
15 Q And you were the only representative of Gannett  
16 Fleming at that meeting.  
17 A That's correct.  
18 Q Is that correct? Our visits to the site. Can you  
19 tell me how many visits to the site that there  
20 were --  
21 A There were --  
22 Q -- made by Gannett Fleming? I'm sorry.  
23 A There were -- could you tell me which time frame  
24 you're referring to?

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- 1 to this fee proposal.  
2 Q Okay. The phone call that you mentioned, that would  
3 be Exhibit 6. Is that correct?  
4 A Yes.  
5 Q And I neglected to ask you when we went over that,  
6 who was that -- who was that intended for,  
7 Exhibit 6?  
8 A This is written by me for myself.  
9 Q This is a note to yourself?  
10 A Yes. Just a document for the file, basically.  
11 Q Okay. I've noticed you take very -- you keep very  
12 good records at Gannett Fleming.  
13 Do you recall -- did he phone you?  
14 Did you phone him?  
15 A I don't recall.  
16 Q The third, fourth, fifth, and sixth pages of this  
17 Exhibit, the first page is entitled Scope of  
18 Services. Do you see that?  
19 A Yes, I do.  
20 Q It has a larger title than that; but the center says  
21 Scope of Services.  
22 A Yes.  
23 Q Do you know who prepared this document?  
24 A I don't recall who actually prepared it. I believe  
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- 1 Q This would be prior to submitting a fee proposal,  
2 So prior to January 30th, 2002.  
3 A I believe there was one visit. And that was the  
4 pre-proposal meeting.  
5 Q Did you do any inspection of the site while you were  
6 there?  
7 A We walked around the site.  
8 Q When you say we, was there a guided tour?  
9 A I believe there was a guided tour by the Town of  
10 Falmouth employees that included all designers, all  
11 potential proposers.  
12 Q I understand.  
13 A Okay.  
14 Q The sentence goes on to reference and other  
15 conversations with you. Can you tell me what  
16 conversations this letter is referring to.  
17 A My recollection is that refers to the January 28th  
18 meeting with Mr. Owen and Mr. Haire and myself.  
19 Q That would be the only conversation? That uses the  
20 word plural, conversations.  
21 A There also was the phone call that was marked  
22 earlier. However, there were no specifics discussed  
23 on the project; so -- those are the only two  
24 conversations that I'm aware of at this time prior

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- 1 it was a combination of myself and Michael Haire.  
2 Q Did either one of you have a greater role in  
3 drafting this than the other?  
4 A I don't recall at this time.  
5 Q Do you know when this was prepared?  
6 A The actual date?  
7 Q Yes.  
8 A I do not know.  
9 Q Do you have an idea of when it was prepared?  
10 A Only that it was prepared prior to being mailed on  
11 January 30th of 2002.  
12 Q Would it have been prepared anytime prior to  
13 January 11th? And the reason I ask is because that  
14 was the date of the letter from the Town to  
15 Mr. Haire requesting a proposal.  
16 A My recollection is it was prepared sometime after  
17 the January 28th meeting after we had a meeting with  
18 Mr. Owen.  
19 Q So it would have been prepared in a couple of days?  
20 A Yes.  
21 Q Okay. I would like to go over some of this scope of  
22 services with you. Under task one, review existing  
23 information, do you see that?  
24 A Yes, I do.

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- 1 Q First sentence says, "Review existing preliminary  
2 plans prepared for the Falmouth D.P.W. in 1994 to  
3 understand the D.P.W.'s intent regarding the  
4 objectives of the project." Do you see that?  
5 A Yes, I do.  
6 Q Those preliminary plans would refer to the plans  
7 that were attached as Appendix A to the Request for  
8 Qualifications. Is that correct?  
9 A That's my understanding at this time. Yes.  
10 Q Next sentence, says, "Meet with the D.P.W. staff to  
11 determine current needs of the facility." We talked  
12 about that a little bit before with your user  
13 interview form.  
14 A Yes.  
15 Q Is that correct?  
16 A That's correct.  
17 Q The next sentence says, "Evaluate the preliminary  
18 design to determine if the existing preliminary  
19 plans meet the current needs of the D.P.W. and  
20 prepare recommended modification to the preliminary  
21 plans." Do you see that?  
22 A Yes, I do.  
23 Q The words "preliminary plans" are used twice in that  
24 sentence.

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- 1 A Yes.  
2 Q "Review the recommended modification to the  
3 preliminary plans and the initial construction cost  
4 estimate with the D.P.W. for compatibility with the  
5 D.P.W.'s needs and objectives."  
6 You'll agree with me that in that  
7 sentence "recommended modification" refers to  
8 modification to the preliminary plans. Is that  
9 correct?  
10 A That is correct.  
11 Q Can you tell me what the initial construction cost  
12 estimate would be based upon as that's referenced in  
13 this task one Scope of Services?  
14 A It appears to represent the cost estimate presented  
15 at the briefing session by the Town.  
16 Q The next sentence reads, "Obtain D.P.W. concurrence  
17 with the recommended changes to the preliminary  
18 plan." And as used in that sentence, preliminary  
19 plan has the same meaning as preliminary plans in  
20 the first sentence?  
21 A That's my understanding at this time, yes.  
22 Q And the final sentence says, "Modify the preliminary  
23 plan to incorporate the modification accepted by the  
24 D.P.W." Again, the preliminary plan is the same  
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- 1 A Just once according to my review of it.  
2 Q Evaluate the preliminary design to determine if the  
3 existing preliminary plans.  
4 A Oh, I'm sorry. Yes. It does say it twice.  
5 Q Okay. As used in this third sentence, those  
6 preliminary plans have the same meaning as in the  
7 first sentence?  
8 A That's my understanding at this time, yes.  
9 Q "Prepare and initial construction cost estimate of  
10 the proposed work, including recommended  
11 modifications." Do you see that?  
12 A Yes, I do.  
13 Q The words "recommended modification" are used both  
14 in the sentence I just quoted and the previous  
15 sentence. Do you see that?  
16 A Yes.  
17 Q Do they have -- do those words have the same meaning  
18 in both sentences?  
19 A The first sentence indicates recommended  
20 modifications to the preliminary plans. The second  
21 sentence just states recommended modifications and  
22 could mean more than just the preliminary plans.  
23 Q Is that your understanding of what it does in fact  
24 mean?

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- 1 meaning as in the first sentence?  
2 A That's my understanding at this time, yes.  
3 Q Is there some meaning behind your using my  
4 understanding at this time? Because I don't  
5 understand what it means, actually. Does it mean  
6 you had a different understanding previously, and  
7 you have a new understanding today?  
8 A No.  
9 Q I'm not trying to fight with you. I'm just trying  
10 to understand.  
11 A It just means that that's my understanding of these  
12 statements as we sit here today. It does not  
13 indicate that I had a different understanding of  
14 these.  
15 Q Task three, there's a bullet point there. And the  
16 first bullet point says, "Design a 29,000-plus-or-  
17 minus-square-foot pre-engineered metal building  
18 structure with a concrete knee wall up to four feet  
19 zero inches high around perimeter of building. That  
20 building will be used for indoor storage of vehicles  
21 and for washing of vehicles."  
22 Do you know where the 29,000 plus or  
23 minus square foot figure came from?  
24 A I don't recall exactly how we came up with that;  
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